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Lead Counsel and the EEOC, on behalf of the Plaintiff Class Members

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA,
 SAN FRANCISCO DIVISION**

EDUARDO GONZALEZ, et al., on behalf of
 themselves and all others similarly situated,
 Plaintiffs,

v.

ABERCROMBIE & FITCH STORES, INC., et al.,
 Defendants.

Case Nos. 03-2817 SI, 04-4730 and
 04-4731

**DECLARATION OF BILL LANN
 LEE IN SUPPORT OF
 PLAINTIFFS' MOTION TO
 MODIFY CONSENT DECREE AND
 PARTIAL APPEAL FROM THE
 SPECIAL MASTER'S ORDER**

ELIZABETH WEST, et al., on behalf of
 themselves and all others similarly situated,

Plaintiffs,

v.

ABERCROMBIE & FITCH STORES, INC., et al.,
 Defendants.

EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION,

Plaintiff,

v.

ABERCROMBIE & FITCH STORES, INC., et al.,
Defendants.

I, Bill Lann Lee, declare:

1. I am a shareholder with the law firm of Lewis, Feinberg, Lee, Renaker & Jackson, P.C., counsel of record for the Plaintiffs in the above-captioned action. This declaration is submitted in accordance with Local Rule 7-5 and in support of Plaintiffs' Motion To Modify the Consent Decree and Partial Appeal from the Special Master's Order, submitted herewith. I make this declaration based on my own personal knowledge and, if called as a witness, I could testify competently to the matters set forth herein.

2. Attached as Exhibit 1 is a true and correct copy of Plaintiff's letter dated August 28, 2009.

3. Attached as Exhibit 2 is a true and correct copy of the cover page and pages 2-3 from Plaintiffs' Memorandum in Support of Plaintiffs' Enforcement Proceeding and in Opposition to Abercrombie's Motion Requesting Resolution of the Enforcement Proceeding before Special Master Hunter R. Hughes.

4. Attached as Exhibit 3 is a true and correct copy of the Special Master's Order, dated April 15, 2011.

5. Attached as Exhibit 4 is a true and correct copy of excerpts from the Court-Appointed Monitor's Fifth Annual Compliance Report.

6. Attached as Exhibit 5 is a true and correct copy of excerpts from the Court-Appointed Monitor's Fourth Annual Compliance Report, Third Annual Compliance Report, Second Annual Compliance Report, and First Annual Compliance Report.

1 7. Attached as Exhibit 6 is a true and correct copy of the expert report of Sheldon
2 Zedeck, Ph.D., dated February 23, 2011.

3 8. Attached as Exhibit 7 is a true and correct copy of the excerpts from the
4 deposition of Kathleen K. Lundquist, taken on March 4, 2011.

5 9. Attached as Exhibit 8 is a true and correct copy of the Declaration of Julie
6 Wilensky in Support of Plaintiffs' Motion in the Enforcement Proceeding, executed on March
7 21, 2011.

8 10. Attached as Exhibit 9 is a true and correct copy of the current version of the
9 Model Group Interview Guide, which Abercrombie submitted as Exhibit 4 to the Declaration of
10 Todd Corley.

11 11. Attached as Exhibit 10 is a true and correct copy of "Image Book Activities,"
12 A&F 00454-55, A&F 00529, and "A&F Image Book," A&F 01683-84.

13 12. Attached as Exhibit 11 is a true and correct copy of page 25 of the "Conducting
14 an Interview" section of the PSP Training, which Abercrombie submitted as Attachment C to the
15 Expert Report of Dr. Kathleen K. Lundquist, dated Dec. 31, 2010.

16 13. Attached as Exhibit 12 is a true and correct copy of Exhibit 1 to the Declaration of
17 Julie Wilensky, executed on March 21, 2011.

18 I declare, under penalty of perjury and the laws of the State of California, that the
19 foregoing is true and correct.

20 Executed this 29th day of April, 2011, at Oakland, CA.

21
22 /s/ Bill Lann Lee
23 Bill Lann Lee
24 Attorney for Plaintiffs
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